

## **EXHIBIT A**

**From:** [Oracle Data Privacy Settlement](#)  
**To:** [Christopher Williams](#)  
**Subject:** Re: Questions about settlement and allegations of the lawsuit  
**Date:** Wednesday, September 11, 2024 9:25:34 AM  
**Attachments:** [2024-08-09 Order Granting Preliminary \[dckt 135 0\].pdf](#)  
[Plaintiffs' Unopposed Notice of Motion and Motion for Preliminary Approval of Class Action Settlement and Direction of Notice Under Rule 23\(e\).pdf](#)  
[Katz v. Oracle - Second Amended Complaint.pdf](#)

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Apologies; here are the attachments.

On September 11, 2024 at 2:21:13 PM UTC, [questions@katzprivacysettlement.com](mailto:questions@katzprivacysettlement.com) wrote:

Hello,

To answer your questions in order:

1. While the Settlement Agreement has not yet been approved (the Final Approval Hearing is scheduled for 11/14/2024), attached is the Motion for Preliminary Approval for your review. All exhibits are included.
2. We unfortunately cannot provide documentation that is not already available on the Settlement Website; however, attached are the Plaintiff's Unopposed Motion and the Second Amended Complaint.
3. The Claims not dismissed by the District Court were the Plaintiff's claims of (1) intrusion upon seclusion under California law on behalf of the California SubClass, (2) invasion of privacy, CIPA, FSCA, (3) unjust enrichment, (4) declaratory judgment, and (5) injunctive relief. The Plaintiff's remaining claims were dismissed: (1) intrusion upon seclusion claim on behalf of the Florida Sub-Class under Florida law, (2) intrusion upon seclusion claim under California law on behalf of the United States Class, (3) unjust enrichment claim under California law on behalf of the United States Class, and (4) Plaintiff's ECPA claim).
4. It is the case in many class action lawsuits that Class Members are required to submit a declaration under penalty of perjury. This ensures that Class Members are completing the forms on their own behalf, that Class Members are not previously involved with the Action, and that all information provided is true and accurate to the best of the Class Member's knowledge.
5. If you received a Notice, it indicates that you were included in the Class Data provided by Oracle and were likely impacted by Oracle's practices.
6. Any objection to the proposed settlement must be in writing and contain the following:
  - a. The name and case number of this lawsuit (Katz-Lacabe et al v. Oracle America, Inc., the case

number is 3:22-cv-04792-RS);

- b. The basis for believing you are a Settlement Class Member;
- c. Your full name and mailing address, and email address or telephone number;
- d. A clear and concise statement of all reasons for your objection;
- e. Whether you intend to appear at the Final Approval Hearing, either in person or through an attorney representing you;
- f. A statement identifying your counsel, if you are represented by counsel;
- g. Your handwritten or electronically imaged written (e.g., "DocuSign") signature. An attorney's signature, or a typed signature, is not sufficient.

Any objection to the proposed settlement must be submitted to the Court either by filing them electronically or in person at any location of the United States District Court for the Northern District of California, or by mailing them to the Class Action Clerk, United States District Court for the Northern District of California, and be filed or postmarked on or before **October 17, 2024**:

Class Action Clerk  
United States District Court for the Northern District of California  
450 Golden Gate Avenue  
San Francisco, CA 94102-3489

For more information regarding specific legal documents or details, please feel free to contact Class Counsel (LIEFF CABRASER HEIMANN & BERNSTEIN, LLP ) directly at [PrivacySettlement@lchb.com](mailto:PrivacySettlement@lchb.com).

Regards,  
Katz Privacy Settlement Administrator  
KW

On September 11, 2024 at 1:42:35 AM UTC, [chris@williamslitigation.com](mailto:chris@williamslitigation.com) wrote:

> Good morning. I have a few questions.

(1) can someone please send me the entire motion for settlement approval, including all exhibits attached to the motion for settlement approval?

(2) is it possible for the settlement administrator to include all filings made in this case that are available on PACER?

(3) can someone tell me what claims were dismissed by the district court and which claims were \*not\* dismissed by the district court?

(4) why are class members required to submit a declaration under penalty of perjury to receive compensation?

(5) how are individual class able to determine if Oracle did, in fact, gather information on them or if they were subject to the treatment|conduct of Oracle as alleged in the complaint?

(6) If I have questions that the I believe the settlement administrator is not answering, who do I contact to obtain the answer, particularly if I am objecting to the motion for settlement approval?

Thank you.

Christopher L. Williams  
843.323.5017

**From:** [Christopher Williams](#)  
**To:** [Oracle Data Privacy Settlement](#)  
**Subject:** RE: Questions about settlement and allegations of the lawsuit  
**Date:** Tuesday, September 10, 2024 11:50:57 AM

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What you are saying is misleading, whether intentional or otherwise, so I am not going to ask questions to what apparently is a non-attorney settlement administrator.

**From:** Oracle Data Privacy Settlement <[questions@katzprivacysettlement.com](mailto:questions@katzprivacysettlement.com)>  
**Sent:** Tuesday, September 10, 2024 10:59 AM  
**To:** Christopher Williams <[chris@williamslitigation.com](mailto:chris@williamslitigation.com)>  
**Subject:** Re: Questions about settlement and allegations of the lawsuit

Thank you for your email.

All documents (including the Settlement Agreement, Amended Class Complaint, Declarations, Orders, Plaintiff's Motion for Attorney Fees, etc) related to this Settlement can be found here:  
<https://www.katzprivacysettlement.com/important-documents>

Thank you,  
Katz Privacy Settlement Administrator  
[www.KatzPrivacySettlement.com](http://www.KatzPrivacySettlement.com)

On September 9, 2024 at 10:49:36 PM UTC, [chris@williamslitigation.com](mailto:chris@williamslitigation.com) wrote:

Good afternoon. Can you please provide a response to the below question, namely can you provide me a copy of the transcript for the one deposition taken in this case?

On Sep 6, 2024, at 8:17 PM, Christopher Williams  
<[chris@williamslitigation.com](mailto:chris@williamslitigation.com)> wrote:

Can you please send me the transcript of the one deposition taken in this case? Thank you.

On Sep 6, 2024, at 5:53 PM, Christopher Williams  
<[chris@williamslitigation.com](mailto:chris@williamslitigation.com)> wrote:

Then Class Counsel has not done its job, though it has obviously expanded a lot of effort to support its attorneys fees -

notably, you failed to answer that question

On Sep 6, 2024, at 5:46 PM, Oracle Data Privacy Settlement

<[questions@katzprivacysettlement.com](mailto:questions@katzprivacysettlement.com)> wrote:

Thank you for contacting the Katz Privacy Settlement Administrator.

Under the Settlement, Oracle will pay \$115 million to establish a Settlement Fund.

After first deducting any court-approved attorneys' fees and expenses, Service Awards for the Class Representatives, and the Settlement Administrator's costs and fees, the resulting Net Settlement Fund will be distributed to Settlement Class Members who have submitted a Valid Claim on a pro rata basis. The amount of the payments to individual Settlement Class Members will depend on the number of Valid Claims that are filed. Because the final payment amount cannot be calculated before all claims for compensation are received and verified, it is not possible to provide the precise amount of the payment for each valid claim before the deadline to file claims.

Settlement Class Members who submit a Valid Claim will be able to choose whether to receive their payment via Zelle, Venmo, ACH Transfer, virtual prepaid card or paper check.

Thank you,  
Katz Privacy Settlement Administrator  
[www.KatzPrivacySettlement.com](http://www.KatzPrivacySettlement.com)

On September 6, 2024 at 9:08:34 PM UTC,  
[chris@williamslitigation.com](mailto:chris@williamslitigation.com) wrote:

Sure. (1) do you have any idea whatsoever what the estimated monetary recovery will be for each



class member?; (2) why are you seeking (counting the lodestar multiplier) \$1650/hour for staff attorneys and up to \$4,000/hour for one partner's time? I'm a plaintiffs lawyer and am always in favor of lawyers getting paid well, particularly for contingency cases, but that is incredibly excessive even by my standards

On Sep 6, 2024, at 4:31 PM, Oracle Data Privacy Settlement <[questions@katzprivacysettlement.com](mailto:questions@katzprivacysettlement.com)> wrote:

Thank you for your response.

Please let us know if we can answer any specific questions related to the Settlement Agreement.

Thank you,  
Katz Privacy Settlement Administrator  
[www.KatzPrivacySettlement.com](http://www.KatzPrivacySettlement.com)

On September 6, 2024 at 8:14:59 PM UTC, [chris@williamslitigation.com](mailto:chris@williamslitigation.com) wrote:

This helps zero. I am an attorney and I will file a formal objection. Hopefully a public interest group will do the same.

On Sep 6, 2024, at 3:42 PM, Oracle Data Privacy Settlement <[questions@katzprivacysettlement.com](mailto:questions@katzprivacysettlement.com)> wrote:

Thank you for contacting the Katz Privacy Settlement Administrator.

The complaint in this case alleges that Oracle tracks individuals' online activity (e.g., web browsing) and offline activity (e.g., in-store purchases, geolocation) and combines this and other information and makes this and other derivative data available to third parties without individuals' consent. The complaint alleges that Oracle's conduct was unlawful and violated individuals' privacy rights. Oracle denies all the allegations made in the lawsuit and does not make any admission of guilt or wrongdoing by entering into the Settlement. No court or other entity has made any findings against Oracle nor any determination that the law has been violated.

The time period at issue in this suit is August 19, 2018, to the date of final judgment in this case.

The current complaint filed in this litigation, which describes the specific legal claims alleged by the Plaintiffs and the relief sought, is available on the Settlement Website, at [www.KatzPrivacySettlement.com](http://www.KatzPrivacySettlement.com). You can also find a copy of the Court's orders on Oracle's motions to dismiss the Plaintiffs' legal claims, which sustained some claims and dismissed others, on the Settlement



Website at  
[www.KatzPrivacySettlement.com](http://www.KatzPrivacySettlement.com).

Thank you,  
Katz Privacy Settlement  
Administrator  
[www.KatzPrivacySettlement.com](http://www.KatzPrivacySettlement.com)

On September 3, 2024  
at 2:40:29 PM UTC,  
[chris@williamslitigation.com](mailto:chris@williamslitigation.com)  
wrote:

Good morning. I  
received a notice of  
settlement in a class  
action matter  
involving Oracle and  
its apparent  
distribution of  
information  
regarding class  
members. I have a  
few questions about  
the allegations of the  
lawsuit and the  
settlement so can  
someone please  
contact me at the  
number below.  
Thank you.

Christopher Williams  
843.324.5017

